The Honorable Marsha J. Pechman 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 JULIE DALESSIO, an individual, No. 2:17-cv-00642-RSM 9 Plaintiff. STIPULATED MOTION TO EXTEND 10 v. THE DISCOVERY AND DISCOVERY MOTION DEADLINE 11 UNIVERSITY OF WASHINGTON, NOTED ON MOTION CALENDAR: 12 Defendant. October 25, 2017 13 14 I. RELIEF REQUESTED The parties hereby request the Court grant their stipulated motion to extend the 15 discovery motion deadline from October 27, 2017 to November 17, 2017, and the discovery 16 17 cutoff from November 27, 2017 to December 19, 2017. The parties do not believe it is necessary to change any other deadlines at this time. 18 19 II. STATEMENT OF FACTS The parties met and conferred pursuant to FRCP 26 on October 23, 2017, regarding 20 Plaintiff's first two sets of interrogatories and requests for production of documents. Chen 21 22 Decl., at ¶ 2. While the discussion was productive, the parties were unable to agree regarding at least a majority of the items in dispute. *Id.* 23 Defendant filed a motion for summary judgment on August 24, 2017, that is 24 currently pending. The parties, therefore, agree to stipulate to extending the discovery 25 cutoff and discovery motions deadline. *Id.* 26 27 STIPULATED MOTION TO EXTEND THE DISCOVERY AND DISCOVERY MOTION DEADLINE - 1

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## III. ISSUE STATEMENT

Should the Court extend the discovery motions deadline and discovery cutoff deadline less than a month where there is a pending motion for summary judgment and where the parties have mutually agreed to do so?

## IV. EVIDENCE RELIED UPON

• Declaration of Derek Chen

## V. ARGUMENT AND AUTHORITY

Pursuant to WDLCR 7(d)(1) and 10(g), the parties respectfully request the Court extend the discovery motion deadline from October 27, 2017 to November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19, 2017. While the parties understand these motions are generally disfavored, the defendant believes there is sufficient cause for these short extensions.

Defendant filed a motion for summary judgment to dismiss all claims roughly two months ago, and the parties believe the Court will rule on this motion soon. The Court's ruling will possibly narrow the scope of the discovery disputes between the parties. This will likely significantly conserve both the parties' resources as well as the Court's resources if court intervention is necessary. Therefore, judicial economy as well as conservation of resources strong favors these short extensions.

In addition, the requested extensions are less than a month. The proposed extensions do not move the trial date or any other part of the case schedule. The unique circumstances of this situation are such that the short extension has the potential to significantly clarify current disputes as well as conserve resources. Neither party will be prejudiced by this extension.

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1 SIGNED this 25th day of October 2017 2 KEATING, BUCKLIN & McCORMACK, INC., P.S. 3 4 By: /s/ Derek C. Chen By: /s/ Julie Dalessio 5 Derek C. Chen, WSBA #49723 Julie Dalessio, Pro se Plaintiff Special Assistant Attorney General for 6 Defendant 7 8 [PROPOSED] ORDER 9 The stipulated request for an extension IS HEREBY GRANTED, and IT IS 10 HEREBY ORDERED that the discovery motion deadline from October 27, 2017 to 11 November 17, 2017, and the discovery cutoff from November 27, 2017 to December 19, 12 2017. 13 14 The Honorable Marsha J. Pechman 15 16 17 18 19 20 21 22 23 24 25 26 27

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CERTIFICATE OF SERVICE 1 I hereby certify that on October 25, 2017, I electronically filed the foregoing with 2 the Clerk of the Court using the CM/ECF system which will send notification of such filing 3 to the following: 4 5 **Attorneys for Pro-Se Plaintiff** 6 Julie Dalessio 7 1110 29th Ave. Seattle, WA 98122 8 Telephone: (206) 324-2590 9 Email: juliedalessio@msn.com 10 11 DATED: October 25, 2017 12 13 /s/ Derek C. Chen Derek C. Chen, WSBA #49723 14 Special Assistant Attorney General for Defendant 15 801 Second Avenue, Suite 1210 16 Seattle, WA 98104-1518 Phone: (206) 623-8861 17 Fax: (206) 223-9423 Email: dchen@kbmlawyers.com 18 19 20 21 22 23 24 25 26 27 STIPULATED MOTION TO EXTEND THE DISCOVERY

STIPULATED MOTION TO EXTEND THE DISCOVERY AND DISCOVERY MOTION DEADLINE - 4 2:17-cv-00642-RSM

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